

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>SECURITIES AND EXCHANGE COMMISSION,</b>	:
	:
<b>Plaintiff,</b>	:
	:
<b>– against –</b>	:
	:
	<b>18 Civ. 8175 (ER)</b>
	:
	<b>ECF CASE</b>
	:
<b>BARRY C. HONIG, MICHAEL BRAUSER,</b>	:
<b>JOHN STETSON, JOHN R. O’ROURKE III,</b>	:
<b>ROBERT LADD, ELLIOT MAZA, BRIAN KELLER,</b>	:
<b>JOHN H. FORD, ATG CAPITAL LLC, GRQ</b>	:
<b>CONSULTANTS, INC., HS CONTRARIAN</b>	:
<b>INVESTMENTS, LLC, GRANDER HOLDINGS, INC.,</b>	:
<b>and STETSON CAPITAL INVESTMENTS INC.,</b>	:
	:
<b>Defendants.</b>	:
-----X	

**STIPULATION AND [PROPOSED] ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for Defendant Michael Brauser and Plaintiff Securities and Exchange Commission (“Commission”), that any and all discovery obtained by Defendant Brauser pursuant to his Rule 34 Document Request to the Commission (the “Discovery Material”) shall be retained by him in confidence and shall not be disclosed to or shared with (i) any other Defendant in this matter who (a) declines to produce documents in response to the Commission’s Rule 34 Document Request to him by reason of his assertion of an act of production privilege or any other assertion of his Fifth Amendment privileges, or by reason of his obtaining an extension from the Commission on his time to respond; or (b) has not executed the Confidentiality Stipulation and Order entered by the Court; and (ii) any entity

controlled by any such Defendant. Nothing herein shall preclude Brauser from disclosing such Discovery Material as part of a public filing made by Brauser in this matter.

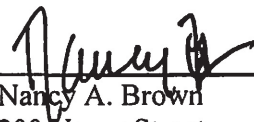
Dated: New York, New York  
May 24, 2019

MICHAEL BRAUSER and GRANDER  
HOLDINGS, INC.

SECURITIES AND EXCHANGE  
COMMISSION

By: /s/ Dennis Richard  
Dennis Richard  
Richard and Richard, PA  
Tower III – 17th Floor 825 Brickell Bay  
Drive  
Miami, FL 33131  
305-374-6688

Attorneys for Defendant Michael Brauser

By:   
Nancy A. Brown  
200 Vesey Street  
Suite 400  
New York, NY 10281  
212-336-1023

Attorneys for Plaintiff Securities and Exchange  
Commission

So Ordered:

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE